

REMARKS

Claims 1-8, 10-24 and 26-34 are pending in the application and stand rejected. By the above amendment, claims 1 and 28 have been amended. The Examiner's reconsideration of the claim rejections is respectfully requested based on the above amendments and following remarks.

Claim Objections

Claim 33 has been amended to fix a grammatical error. Accordingly, withdrawal of the objection is requested.

Claim Rejections – 35 U.S.C. § 101

Claims 1-12 and 28-32 stand rejected as being directed to non-statutory subject matter. The preambles of claims 1, 28 and 33 have been amended to recite a "computer-implemented method". As such, the claims cannot be construed as being directed to an abstract idea or mental process. Moreover, both claims 1 and 28 generally include document processing steps and, thus produce, useful tangible results.

Further, claim 32 is directed to *a program storage device that embodies program instructions for performing a certain process*. Claim 32 is clearly directed to statutory subject matter, as it is directed to a tangible storage medium or product, not simply a program *per se*. Thus, withdrawal of the rejections is requested.

Claim Rejections – 35 U.S.C. § 103

(i) Claims 1-8, 10-12 and 33-34 stand rejected as being unpatentable over Vxml in view of Dodrill, as set forth on pages 2-5 of the Office Action. Applicants respectfully submit that at the very minimum, the combination of Vxml and Dodrill is legally deficient to establish a *prima facie* case of obviousness against claims 1 and 33. More specifically, with respect to claim 1, it

is submitted that the Examiner has not explained with legally sufficiency how the combination of Vxml and Dodrill discloses or suggests the claim feature of *creating a re-entrant reusable VoiceXML dialog component that allow reusable VoiceXML dialog components to be one of initiated, interrupted, inspected, or resumed with a partially filled result object or state object*, as essentially recited in claim 1. Examiner essentially acknowledges that neither reference specifically discloses the claimed re-entrant objects, but provides (on page 4 of the Office Action) conclusory assertions to explain how such feature would have been “obvious” to one of ordinary skill in the art.

It is respectfully submitted, however, that such reasoning is nothing more than impermissible hindsight reasoning based on Applicants’ disclosure. The Examiner has not specifically addressed Applicants’ previous arguments regarding the lack of teaching of such references with respect to the claimed *re-entrant objects*. Further, the Examiner’s basis for obviousness appears to miss the point because the Examiner does not even specifically address the claim language with respect to the characteristics of re-entrant objects – *objects that allow reusable VoiceXML dialog components to be one of initiated, interrupted, inspected, or resumed with a partially filled result object or state object*, as claimed in claim 1.

Therefore, claim 1 is patentable over the combination of Vxml and Dodrill. Moreover, claim 2-8 and 20-12 are patentable over such combination at least by virtue of their dependence from claim 1.

Furthermore, with respect to claim 33, it is respectfully submitted that the combination of Vxml and Dodrill does not disclose or suggest a server-side speech application server comprising, inter alia, *a database of server-side reusable VoiceXML dialog components that are*

used by a page generation engine for generating an intermediate VoiceXML page. Again, the Examiner relies on Dodrill (Col. 9, lines 1-5) as disclosing this feature (see page 5 of the Office Action). However, such reliance on Col. 9, lines 1-5 in this regard is respectfully misplaced. Moreover, Examiner's reliance on Dodrill's teaching of inserting parameters into an entry field for display of a form by a voice enable browser (as contended on page 13 of the Office Action) is *simply irrelevant* to the claimed feature. This disclosure is not related to building an intermediate VoiceXML page from server-side reusable components. Overall, the Examiner's reliance on Dodrill appears to be misplaced and irrelevant to the claimed invention.

Moreover, claim 34 is at least patentable over the combination of Vxml and Dodrill at least by virtue of its dependence from claim 33.

(ii) Claims 13-24 and 26-32 stand rejected under 35 U.S.C. § 103 as being unpatentable over Vxml in view of Sorsa and further in view of U.S. Patent No. 6,490,564 to Dodrill, (Dodrill '564) for the reasons set forth on pages 7-12 of the Office Action. Applicants respectfully submit that at the very minimum, the combination of Vxml and Sorsa and Dodrill '564 is legally deficient to establish a *prima facie* case of obviousness against claims 13, 28 and 32.

More specifically, with respect to claim 13, for the reasons explained above, Vxml does not disclose or suggests *reusable VoiceXML dialog components comprise one or more re-entrant reusable VoiceXML dialog component that allow reusable VoiceXML dialog components to be one of initiated, interrupted, inspected, or resumed with a partially filled result object or state object*, as recited in claim 13. This was clearly explained in Applicants previous response as well as in Applicants' specification. Claim 13 is patentable over the combination of Vxml and Sorsa

and Dodrill '564. Moreover, claims 14-27 are patentable over such combination at least by virtue of their dependence from claim 13.

Furthermore, with respect to claims 28 and 32, the combination of Vxml and Sorsa and Dodrill '564 does not disclose or suggest *dynamically compiling a grammar for the invoked reusable VoiceXML dialog component*, as recited in claims 28 and 32. On page 10 of the Office Action, the Examiner acknowledges that neither Vxml nor Sorsa discloses dynamic compilation of grammars. The Examiner reliance on Col. 5, lines 60-67 of Dodrill '564 as disclosing such feature, is clearly misplaced, as the cited section does not remotely disclose or suggest dynamic compilation of grammars. Accordingly, claims 28 and 32 are patentable over the combination of Vxml and Sorsa and Dodrill '564. Moreover, claims 29-31 are patentable over the combination of Vxml and Sorsa at least by virtue of their dependence from claim 28.

Accordingly, withdrawal of the claim rejections under 35 U.S.C. § 103 is requested.

Respectfully submitted,



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